

TITLE 326 AIR POLLUTION CONTROL BOARD

**DEVELOPMENT OF AMENDMENTS TO RULES CONCERNING LEAD EMISSION
LIMITATIONS FOR HAMMOND GROUP-HALSTAB DIVISION IN LAKE COUNTY**

#96-13 (APCB)

The Department of Environmental Management (IDEM) requested public comment from January 1, 1998, to January 30, 1998, on IDEM's draft rule language. IDEM received comments from the following parties:

Swidler & Berlin, on behalf of Hammond Lead (SB)

Following is a summary of the comments received and IDEM's responses thereto:

Comment: The Second Notice of Comment Period includes a requirement that Halstab Division conduct ambient monitoring for a period of at least twenty-four (24) months. The monitoring requirement expires after that time frame provided that the monitored values do not exceed eighty percent (80%) of the National Ambient Air Quality Standard (NAAQS) level for lead. Halstab has submitted computer dispersion modeling results which demonstrated that the proposed lead emissions limitations would not result in a violation of the Lead NAAQS. Thus, the Halstab Division contends that the proposed monitoring requirement is not necessary since the facility has demonstrated compliance with the Lead NAAQS based on the proposed lead emissions limitations.

Response: The purpose of the monitoring is to ensure that with the removal of the restriction on operating hours, lead levels in the vicinity of the plant do not increase. Results of the air quality modeling predict that lead levels will not increase. However, given the toxicity of lead in the ambient air, especially to children, IDEM believes that this additional safeguard is appropriate until monitoring confirms that the revised rule will not increase lead levels.

Comment: If IDEM continues to recommend ambient monitoring, the proposal should be amended to clarify that the monitoring data be averaged on a calendar quarter basis for purposes of comparison to the lead NAAQS which is averaged over a calendar quarter.

Response: The individual daily monitored data values will be submitted to the department. The department will then perform the averaging for comparison to the NAAQS.

Comment: Expiration of the monitoring obligation should not be predicated on an eighty percent (80%) compliance demonstration with the lead NAAQS. Additional monitoring should only be considered in the event of a verified violation of the lead NAAQS.

Response: Hammond Lead requested that a specific compliance demonstration level be set so the company will know how the department will be evaluating the data and what goal they need to meet to be released from the monitoring requirements. The modeling analysis submitted by Hammond Lead shows a summer quarter level that is close to an eighty percent (80%) level of the NAAQS if the facility were operating twenty-four hours a day. Therefore, the department feels the eighty percent (80%) level is not unreasonable since this rule making action deletes the restriction on number of operating hours per calendar quarter. The eighty percent (80%) level will be used as a standard to determine if additional monitoring is required, it will not be used to determine compliance.

Comment: In 326 IAC 15-1-2(7)(A), (B), and (C), insert the word “ambient” before the word “monitoring” to clarify the type of monitoring imposed on the facility.

Response: The department agrees and has made the change.

Comment: In 326 IAC 15-1-2(7), delete the requirement to commence monitoring on the “effective date of this rule” as monitoring should commence only after the protocol is approved by the department. Hammond Lead recommends language that “monitoring shall commence within thirty (30) days of IDEM’s approval of the protocol” in order to provide the facility with sufficient time to arrange for utilities and install the monitoring equipment.

Response: The rule has been changed to reflect that the ambient monitoring shall begin within thirty (30) days of the approval of the ambient monitoring quality assurance plan.

Comment: 326 IAC 15-1-2(7)(A) of the proposed amendments requires the facility to “install and maintain one (1) baghouse with a primary laminated filter and a secondary HEPA filter” on certain stacks. For clarification purposes, we propose that the provision be revised to require the facility to “install and maintain one (1) baghouse with laminated filters followed by one (1) HEPA filter unit in series with the baghouse” for the specified stacks.

Response: The department agrees and has made the change.